



VIA ELECTRONIC AND OVERNIGHT MAIL

July 31, 2018

Mr. Paul Schwaab
U.S. Environmental Protection Agency
300 Minnesota Avenue
Kansas City, Kansas 66101
schwaab.paul@epa.gov

**RE: Facility Inspection July 23-26, 2018
Johnson County Landfill
Shawnee, Kansas**

Dear Mr. Schwaab:

Deffenbaugh Industries, Inc. (Deffenbaugh) is providing this information as a follow-up to your inspection of the Johnson County Landfill on July 23-26, 2018. Pursuant to your July 26 inspection notice, the following corrective action measures have been implemented or completed:

- A total of 17 surface emission monitoring (SEM) exceedances were identified during the inspection. Corrective action (i.e. placing additional cover material, or equivalent is being implemented at these locations in accordance with 40 CFR §60.755(c)(4) and Condition VI.A.1.e of the facility's Class I Operating Permit (Source ID No. 0910117). As noted in 40 CFR §60.755(c)(4), if the specified corrective actions are taken, these exceedances are not a violation of the operational requirements of §60.753(d).
- The broken hour meter on the diesel emergency generator has been replaced.

Surface emission monitoring is performed at the site in accordance with 40 CFR §60.753(d). Testing is performed around the perimeter of the collection area, a pattern that traverses the site at 30-meter intervals, and at locations where visual observation indicates elevated concentrations of landfill gas, such as distressed vegetation or cracks in the cover.

The requirement to monitor all penetrations was included in the recently promulgated NSPS and EG rules for municipal solid waste landfills (40 CFR 60, Subparts XXX and Cf, respectively). Johnson County Landfill is not currently subject to the provisions of these subparts, and remains subject to 40 CFR 60, Subpart WWW. With respect to the penetration monitoring requirement of XXX and Cf, EPA noted in the July 2016 *Responses to Public Comments on EPA's Standards*



of Performance for Municipal Solid Waste Landfills and Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills: Proposed Rules that "This clarification does not apply retroactively to 40 CFR part 60, subpart WWW." (p736).

If you have any questions, please do not hesitate to contact me at (913) 667-8764.

Sincerely,

A handwritten signature in blue ink that reads "Darryl Basham". The signature is fluid and cursive.

Darryl Basham, P.E.
Engineering Manager